

P-04-489 A National affordable and priority housing Act of Wales – Correspondence from the petitioner to the clerking team, 02.12.2013

Please accept these as my responses to Carl Sargeants letter on November the 12th (2013)

I am grateful to Carl Sargeant for his response on November 12th. It is unfortunate however that he seems not to have responded to the main point of the petition which is to ask for a bill/Act to make sure new homes are built and sold/rented/priced proportionally to average local authority wages and that Welsh citizens have priority to buy/rent the majority of these new homes as happens in the Lake District, the Peak district and North York Moors in England for example. The suggestion of this petition is that a 5 - 10 year priority rule would be reasonable for new normal and social housing (other than extreme urgent situations that suddenly arise) but would not affect persons crossing the border to take up employment opportunities in Wales, key workers, students, business creators and companies, the self employed or asylum seekers, as already catered for under UK law. This would not have to apply to existing homes in Wales.

This is a similar idea to what Prime minister David Cameron recently outlined when he stated that he wanted to introduce an ‘expectation’ that local authorities will introduce a local residency test determining who should qualify for social housing. He stated:

"New migrants should not expect to be given a home on arrival. And yet at present almost one in ten new social lettings go to foreign nationals. So I am going to introduce new statutory housing allocations guidance this spring to create a local residence test. This should mean that local people rightly get priority in the social housing system. And migrants will need to have lived here and contributed to this country for at least two years before they can qualify."
<http://www.insidehousing.co.uk/blogs/local-priority/6526291.blog> (a similar scheme was announced by Labour in June 2009 as part of the Building Britain’s Future relaunch of Gordon Brown’s premiership)

In the same link above, housing minister Mark Prisk spells out the rules that already apply to allocations:

"Most foreign nationals who have recently come to England are not eligible for

an allocation of social housing. Broadly speaking, European economic area nationals are eligible if they are working, self-sufficient, or have a permanent right of residence in the UK (after five years lawful residence in the UK)"

Even though this is an UK state issue, as housing is a devolved issue it should be obvious that Wales should be allowed to make similar safeguarding policies in its own right - even more so considering its lack of monetary, economic and tax raising powers and the fact that many areas of Wales are suffering from worse poverty than Eastern European countries such as Bulgaria.

Mr Sargeant states in his reply that: "The household projections for local authorities in Wales are prepared by Welsh Government statisticians independently of Ministers and policy officials and are designated as National Statistics by the UK Statistics Authority" but no one I've spoken to is aware that the Welsh Government has any statisticians of its own and, by Uk Statistics Authority - I take it Mr Sargeant means an authority related to the Office of National Statistics?

Currently, the Planning Inspectorate is not answerable to the Welsh Government and merely informs the Welsh Government of what decisions it's arrived at. This highlights the numerous calls for a specific, transparent and democratically accountable Welsh planning inspectorate and projections research unit as a completely independent body for Wales, working hand in hand with local authorities and with the communities involved, who should also be able to appeal decisions

As previously quoted from a Welsh Government report entitled '*The effects of recent migration on local authorities: allocation of housing and actions under homelessness legislation - a study in six local authorities - Executive summary*', it was also stated that many elected members questioned for the report felt that housing associations gave priority to assisting inward migration by accommodating greater numbers of people from outside the area rather than concentrating on local citizens as should be their remit. The impact of recent migrants for social housing was also claimed to prevent local people from accessing social housing, had an averse impact on Welsh language and culture, and had brought a disproportionate impact and change to rural communities.

The Welsh Government has a duty and responsibility to rectify this by insisting that local need and economic sustainability must come first and that there is also a Welsh language impact assesment of all new housing developments. The

current Sustainability bill white paper and its sustainable communities agenda developments goes against its own remit by ignoring these fundamental issues and responsibilities.

Along the same lines, it should be restated that under the Local Government Act 2000, the Welsh Government, Assembly members as well as local authorities have been given the responsibility of “promoting the social, economic and environmental well being of their area and producing community strategies which contribute to the achievement of sustainable development in the UK”. These current LDP housing projections simply don't do that and are not based on sustainable community visioning.

This could be changed by a National Housing Act of Wales that provided the framework and policy for a genuinely worthwhile housing strategy, and which took in to consideration jobs availability and the economy of Wales as well as other important sustainability matters such the rights and vitality of the Welsh language in Wales. An effective act would also allow local authorities to scrap the current LDP plans and replace them with their own formulated, annually reviewed plans where necessary, based on local need and working alongside local community groups.

Lastly it should be noted that the current non LDP housing plans are adequate enough for the needs of sustainable growth within Wales and that the proposed LDP projections are exponential, misguided and not fit for purpose. A clear example of this can be seen by the Office of National Statistics/Welsh Government projected household figures versus the actual household figures. The 2011 census shows that there were 1,302,700 households in Wales. This did not cause any major housing shortages or mass homelessness problems and is roughly in line with actual demand.

In 2008, the data sheet entitled 'Households by type and year' was published by the Welsh Government Stats Wales site:

<https://statswales.wales.gov.uk/Catalogue/Housing/Households/Projections/National/2008-Based/Households-by-Type-Year> which projected how many households there would be in Wales in each year from 2008 until 2033. This document predicted that there would be 1,335,911 households in Wales by 2011; however the 2011 census showed there to be only 1,302,700 households in Wales:

<http://www.ons.gov.uk/ons/search/index.html?newquery=ons+2011+census%3>

[A number of households with at least one usual resident%2C unitary authorities in Wales](#)

It is apparent that the 2008 projections were wholly flawed, and given that they were based on estimates of the number of households in Wales in 2008 this isn't surprising. What is surprising is that the Welsh Government continue to use what seem to be flawed projections, and that it has had since 2011 to recognise the inaccuracy of its 2008 projections. This raises the question of why these official household numbers projections haven't been revised in the past 2 years.

These inaccurate projections could cause an over supply of new homes. Building a mass surplus of unnecessary new homes with the wishful aim of filling them all at some point in the future, with no thought given to Welsh needs and the sustainability of the Welsh economy and our communities is sheer irresponsibility and needs to be addressed by all our elected representatives.

A quick recap of these main points if I may:

1. The Welsh Government's overall LDP projections of 323,009 new households from between 2008 - 2033 are hugely over inflated and not fit for purpose. Given that the population of Wales has increased at a fairly steady 12,000 a year for the past 15 years, and this also being the present and near future case, there is likely to be an increase of about 5000 households a year in Wales given an average household size of 2.4 persons. This annual new household number would likely be reduced again if an effective and sustainable Housing Priority Act of Wales was in place. These more realistic household figures are at odds with the substantially higher and over projected household figures that the Welsh Government has been promoting via the flawed LDP projections. These can be seen by the exaggerated 12,000-13,000 new households projected annually on average between the years 2008 - 2033, which is at odds with actual need.

2. The Welsh Assembly should introduce a bill which would guarantee that the vast majority of new homes have a 5-10 year Welsh citizen priority clause and/or business/wealth creator/employee priority clause and that the majority are also built and priced proportionally to average local authority wages. This is crucial considering that Wales has no control over currency or other crucial

economic levers.

3. These LDP plans and ONS projections arrangements should be scrapped

4. There should be an exclusive Welsh Planning Inspectorate and projections team democratically controlled and completely transparent, to give guidance on a priority housing bill and to act as mediators between local authorities, local communities and house builders if need be.

5. Local authorities should work with local community groups and decide new home numbers annually which should be based on sustainable actual local need and local infrastructure capabilities.

6. The Welsh Government should follow their own policy of sustainability which should take in to consideration the capability of Welsh infrastructure, public services and availability of new jobs in line with new homes and the impact of large housing developments on the cohesiveness of all communities in Wales, and in order to avoid a detrimental impact on the Welsh language as a spoken community language.